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[Additional Counsel Appear on Signature Page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE MARVELL TECHNOLOGY GROUP, LTD. SECURITIES LITIGATION) Master File No. 06-06286 RMW
) CLASS ACTION
)
) **STIPULATION AND [] ORDER**
) **(1) SETTING TIME FOR FILING OF**
) **CONSOLIDATED CLASS ACTION**
) **COMPLAINT (2) ESTABLISHING**
) **BRIEFING SCHEDULE FOR**
) **RESPONSIVE MOTION(S) AND (3)**
) **CONTINUING CASE MANAGEMENT**
) **CONFERENCE**

THIS DOCUMENT RELATES TO:

All Actions.

Lead Plaintiffs Police and Fire Retirement System of the City of Detroit, Monte Paschi Asset Management S.G.R. S.p.A., and Puerto Rico Government Employees Retirement System (“Lead Plaintiffs”) and defendant Marvell Technology Group, Ltd. (“Marvell”), by and through their respective counsel hereby recite and stipulate, subject to court approval, as follows

[C-06-06286 RMW] STIPULATION AND [] ORDER (1) SETTING TIME FOR
FILING OF CONSOLIDATED CLASS ACTION COMPLAINT; (2) ESTABLISHING
BRIEFING SCHEDULE FOR RESPONSIVE MOTION(S); AND (3) CONTINUING CASE
MANAGEMENT CONFERENCE. 1

1 concerning the filing of a consolidated class action complaint (“Consolidated Complaint”), the
2 briefing schedule for any responsive motions and continuing the Case Management Conference
3 currently scheduled for March 2, 2007.

4 **RECITALS**

5 WHEREAS certain plaintiffs filed this securities class action complaint on October 5,
6 2006 (Dkt. 1), alleging that defendants Sehat Sutardja, Weili Dai, Pantas Sutardja, George A.
7 Hervey and Marvell Technology Group Ltd. engaged in certain conduct in connection with the
8 granting of stock options which allegedly violated federal securities laws;

9 WHEREAS, certain of the claims in this class action arise under the Private Securities
10 Litigation Reform Act of 1995 (the “PSLRA”);

11 WHEREAS, on October 23, 2006, the Court issued an Order Setting Initial Case
12 Management Conference in this case [Dkt. 4], scheduling an Initial Case Management
13 Conference for March 2, 2007, and setting related deadlines;

14 WHEREAS, by order dated February 2, 2007 [Dkt. 112] and amended on February 7,
15 2007 [Dkt. 114], the Court consolidated the related class action complaints and appointed Lead
16 Plaintiffs and Kohn, Swift & Graf, P.C. and Schiffrian Barroway Topaz & Kessler, LLP as Co-
17 Lead Counsel, and Berman DeValerio Pease Tabacco Burt & Pucillo as Liaison Counsel;

18 WHEREAS Marvell Technology Group, Ltd.’s (“Marvell” or the “Company”) has
19 announced that it intends to file restated financials (the “Restatement”);

20 WHEREAS Lead Plaintiffs intend to file a Consolidated Complaint, and Defendants may
21 file motion(s) pursuant to Federal Rule of Civil Procedure 12 in response to the Consolidated
22 Complaint;

23 WHEREAS, although plaintiffs may properly file the Consolidated Complaint at any
24 time, the undersigned counsel agree that the interests of justice and judicial economy would be
25 served by an order giving plaintiffs the option to file the Consolidated Complaint after the
26 Restatement in order to include the Company’s full Restatement in the Consolidated Complaint;
27 and
28

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WHEREAS, the undersigned counsel further agree that the interests of justice and judicial economy would be served by an order continuing the Case Management Conference in this PSLRA case until after the Court has decided all motions to dismiss filed by defendants in response to the Consolidated Complaint.

STIPULATION

Therefore, IT IS HEREBY STIPULATED AND AGREED by Lead Plaintiffs and Defendants, through their respective counsel of record, as follows:

1. Lead Plaintiffs shall file and serve the Consolidated Complaint no later than 45 days after the filing with the SEC of Marvell's Restatement.
2. Defendants shall file and serve their responsive pleading(s) or motions no later than 45 days after the filing of the Consolidated Complaint.
3. Lead Plaintiffs shall file and serve their opposition brief(s) no later than 45 days after the filing of Defendants' responsive pleading(s) or motions.
4. Defendants shall file and serve their reply briefs no later than 21 days after the filing of Lead Plaintiffs' opposition brief(s).
5. Once the Court rules upon the motion to dismiss, the parties shall ask the Court to set a new date for the Case Management Conference.
6. The parties hereby request that the Case Management Conference set for March 2, 2007 at 1:30 p.m. be taken off calendar pending further order of the Court.

Dated: February 22, 2007

BERMAN DeVALERIO PEASE TABACCO BURT & PUCILLO

By: /s/ Nicole Lavallee
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MANAGEMENT CONFERENCE 3

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24 **Additional Counsel for Lead Plaintiffs**

25 I, Nicole Lavallee, am the ECF User whose ID and password are being used to file this
26 Stipulation and [Proposed] Order . In compliance with General Order 45, X.B., I hereby attest
27 that Andrew D. Lanphere has concurred in this filing.

1 Dated: February 22, 2007

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17 **Counsel for Defendant Marvell Technology Group,
18 Ltd.**

19 * * *

20 **[] ORDER**

21 Pursuant to the foregoing stipulation, and good cause appearing,

22 **IT IS HEREBY ORDERED that:**

23 1. Lead Plaintiffs shall file and serve the Consolidated Complaint no later than 45
24 days after the filing with the SEC of Marvell's Restatement.

25 2. Defendants shall file and serve their responsive pleading(s) or motions no later
26 than 45 days after the filing of the Consolidated Complaint.

27 3. Lead Plaintiffs shall file and serve their opposition brief(s) no later than 45 days
28 after the filing of Defendants' responsive pleading(s) or motions.

4. Defendants shall file and serve their reply briefs no later than 21 days after the
filing of Lead Plaintiffs' opposition brief(s).

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5. The Case Management Conference set for March 2, 2007 at 1:30 p.m. is hereby taken off calendar pending further order of the Court.
6. Once the Court rules upon the motion to dismiss, the Court shall set a new date for the Case Management Conference.

IT IS SO ORDERED.

Dated: 2/28, 2007

Ronald M. Whyte
The Honorable Ronald M. Whyte
United States District Judge